

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	CR. No. 04-010304-RCL
	)	
Plaintiff	)	
	)	
v.	)	MOTION FOR LEAVE TO
	)	FILE REPLY
	)	MEMORANDUM TO
	)	GOVERNMENT'S RESPONSE
JARED CROWLEY	)	TO DEFENDANT'S MOTION
	)	TO SUPPRESS
	)	
Defendant	)	REQUEST FOR ORAL
	)	ARGUMENT

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COMES NOW DEFENDANT JARED CROWLEY, by and through his attorney of record, who hereby requests permission pursuant to Local Rule 7.1 B(3) to file a response to the government's response to the defendant's motion to suppress evidence.

Defendant further respectfully requests an evidentiary hearing on the underlying motion.

This motion is made on the ground that good cause exist therefore based on Mr. Crowley's desire to address the government's analysis of case law that was not originally submitted in the motion.

Mr. Crowley further submits that there are significant factual disputes in this warrantless search that make an evidentiary hearing necessary.

WHEREFORE, Defendant respectfully moves this Honorable Court to accept the reply memorandum filed and to hold an evidentiary hearing to resolve any factual dispute.

Date: January 11, 2005

Respectfully submitted,

/s/ ***Victoria M. Bonilla***

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